

ROBERT J. DALTON DEPOSITION-INDEX (IWD Driver)

PAGE

3-Name, Address

3-6-Employment History

7-Does not remember hauling to the PRL.

10-May have been in PRL a couple of times. Does not know if it was as a passenger or hauling the load. If it was hauling a load, has no idea whose [generator] load it was.

39-Does not recall if customers waste was diverted and routed to the PRL.

Date Indexed: 11-23-93

GARY B. ABNER-INDEX (IWD Driver)

PAGE

- 3-Name, Address
- 3-7-Employment History
- 8-Driven to the PRL approximately thirty (30) times.
- 9-Does not recall any particular customer he hauled for. -Construction debris was taken to PRL.
- 15-Took some materials from Cargill to PRL.
 - -Primarily hauled construction, demolition-type material.
 - -Sometimes would haul general trash from apartments or restaurants.
 - -Laidlaw and N & N were other haulers into the PRL.
- 23-Ryan Homes may have sent some construction debris into the PRL.
- 23-24-Hughes-Bechtol may have sent some construction debris into the PRL.
- 26-Mazer Corporation's waste probably went to the PRL.
- 28-Gem City Engineering probably sent waste to the PRL. -Probably put some Mullins Rubber waste in the PRL.
- 29-Pulled loads for L.B. Robinson--could have gone to PRL. -Bendix Corporation's waste probably went to PRL.
- 30-Probably pulled some loads for Frank Messer, it would have gone to PRL or Cardington.
- 31-Waste for Bluebird Pie Company would have gone to the PRL or an incinerator.
 - -Waste for Charles Shook probably went into Cardington or PRL. It was construction debris.

Date Indexed: 11-23-93

<u>JAMES G. RITCHIE-INDEX</u> (IWD Driver)

- 3-Name, Address
- 3-5-Employment history
- 43-Hauled waste for Behm Glass. It was just regular trash that went to the PRL.
 - -Hauled for Buckeye Boiler to PRL. Waste was pallets, paper, and cardboard.
- 44-Cargill--believes the only reason their waste was hauled to PRL was because it was closer than going to the other landfill.
 - -Doesn't remember taking anything to PRL from Children's Medical Center, but says if he was told to take it there, he would have taken it there.
 - -Hauled for City of Vandalia. Waste was residential for the most part.
 - -It is possible that he took Duriron waste to the PRL.
- 45-Elder-Beerman's waste should have gone to the incinerator, unless it was diverted. Waste was store "stuff," like shoe boxes and general trash.
 - -Trash for Emery should have gone to the incinerator. It was just general trash. [Possibly diverted?]
 - -Fred Debra was a general contractor on the base; generated construction debris.
 - -Remembers Gayston Corporation, but not the kind of trash they generated.
 - -Gem City Engineering was an incinerator load but was probably diverted. They generated regular trash.
- 46-Gold Circle was a department store. Its waste was probably diverted to the PRL.
 - -Hewitt Soap's waste would have gone to the landfill probably because of its weight. A lot of times it was heavy, had soap in it. It would cost more at the incinerator than the landfill.
 - -Waste for the Mazer Corp. was probably a diverted load to the PRL. It would have consisted of kids' school books, cardboard, paper and printing-type materials.

- 47-Waste for Modern Industrial Plastics would have normally gone to an incinerator. Its waste was shredded plastic.
 - -Waste for Mullins Rubber went to the PRL. It was rubber strips and moldings.
 - -Ohio Bell generated wires and short pieces of poles.
- 48-Pepsi-Cola was a forty-two yard packer with a lot of glass. It was heavy. They were regular customers. Trash was hauled probably twice a week.
 - -Premier Rubber should have gone to Cardington, but apparently went to the PRL at some point in time.
- 49-Requarth Lumber generated steel bands.
 - -Ryan Homes was a construction outfit.
 - -Shopsmith should have been an incinerator load. Might have been diverted. They make power saws and power tools. Their trash was small cardboard boxes.
- 50-Stouffer's Restaurant was probably diverted to the PRL.
 - -Tru-Foto was probably diverted to the PRL.
 - -Yoder Die Cast would have been a landfill load, but it should have gone to Valleycrest because it's located close to the Valleycrest landfill. Their trash consisted of wood pallets and cardboard boxes.
- 52-Most of the waste for Duraspan was dumped in the incinerator. If it was diverted, it would have gone to the PRL. Waste was styrofoam-like materials.
- 53-Does not recall ever seeing any fires or explosions at PRL. Nothing was ever rejected from PRL or refused. Does not recall any unusual incidents or unauthorized dumping.

Date Indexed: 11-24-93

JOSEPH D. SMART DEPOSITION-INDEX (IWD Driver)

PAGE

- 3-Name, Address
- 3-9-Employment History
- 54-Mullins Rubber--probably went to PRL.
- 58-Ohio Precision Castings--may have sent waste to PRL--white powder, sometimes liquid.
- 71-Hauled waste of American Lubricants, but does not recall it.
 -May have hauled waste for Angel Manufacturing.
- 72-May have hauled for Brainerd Industries.
 -Borchers--car dealer. Waste was just office paper.
- 72-73-Hauled waste from Chrysler to PRL. Waste consisted of trash and skids.
- 74-Dayton Overhead Door--general trash.
- 75-Hauled for Dayton Tire and Rubber. Waste was grease skip and lamp black pieces of rubber--real slimy, sloppy.

Date Indexed: 11-28-93

WILLIAM E. FOURNIER-INDEX (IWD Driver)

- 3-Name, Address
- 3-6-Employment History
- 7-PRL one of landfills waste was hauled to.
- 8-Remembers PRL being on fire a couple of times.
- 54-Hauled to PRL in the 1970's and 1980's sporadically.
- 55-Back in 70's trash had to be diverted to PRL. -Stopped driving about time PRL closed.
- 56-American Freight, forty-two yard compactor, general trash.
 - -Bass Construction, does not recall what was in load.
 - -Cargill was scheduled load to the PRL.
 - -Behm Glass, occasional load, glass moldings and caulking.
- 57-Berger Iron, they had a grindings box and general trash.
 - -Bond Builders--construction debris.
 - -Bowser-Morner--concrete samples--tube-like.
- 58-Cargill had just about all kinds of wastes. Sludge, corn.
 - -Dohm Brothers--a little of everything. Roofing was their business.
 - -Duriron was foundry sand, general trash, occasional sludge load.
- 59-Ed's Truck & Trailer was general trash. They used to build trailers, eighteen wheelers.
 - -Fenton Foundry would have foundry sand and general trash all in one can.
 - -Unsure whether name was Gem City Engineering or Gem City Chemical--just remember Gem City.
 - -Good Samaritan Hospital would be construction debris.
- 60-Harris Graphics had a little bit of everything, but basically just general trash.
 - -Mazer would have paper-like products.
 - -Possert Construction is construction debris, mainly building material. They had several locations.

- -Price Brothers--general trash, dust.
- -Ryan Homes--built homes--construction debris.
- 61-Viacom--cable boxes.
 - -Winston Heat Treat--general trash with dried plaster in it.
 - -Yale Industries--general trash, nothing unusual.
- 62-Remembers hauling 7-up and Pepsi to the PRL. Thinks lost Pepsi to SCA. Hauled bottles and paper.
 -SCA hauled Chrysler waste to the PRL.
- 63-Remembers taking loads of DAP--caulking stuff--into PRL.
- 63-64-Hauled Coca-Cola waste to PRL. Waste similar to Pepsi, broken bottles, glass, CO2 tanks, skids, pallets. Hauled about three times a week.
- 64-Dayton Overhead Door--garage doors and the hardware that went with them.
- 65-McCall's was hauled to PRL by SCA--ink. They had everything, barrels, paper, just ink running out of [the barrels].
- 66-Remembers Delco Moraine hauling their own waste into PRL. Compactors of general trash.
 - -Thinks GM used to go in [PRL] with bagged asbestos. This was from brake dust.
- 67-Frigidaire went to PRL. Did a lot of their hauling-but Frigidaire had own trucks. When tearing down Frigidaire, hauled bricks, demolition, steel.
- 67-68-Globe Industries had a liquid tank--eight cubic yards-smelled flammable--made small electrical components.
 -Old Colony Envelope's waste was hauled into PRL. No longer
 in business.
 - 68-Would haul Protective Treatments occasionally. Had some kind of white chalky stuff, a lot of cardboard, coating stuff.

Date Indexed: 11-28-93

<u>VERNON VENCILL DEPOSITION-INDEX</u> (IWD Driver)

PAGE

- 3-Name, Address
- 3-6-Employment History
- 64-Danis' waste could have been anything (any type of waste).
 -Does not know what kind of waste Bendix Corp. had.
- 65-Would have only gone to PRL if designated to go by dispatcher. Strictly for convenience.
 - -Berger Iron--just basic trash.
- 66-Bowser-Morner--does not know why its waste was hauled to PRL. They did concrete pouring and testing.
 - -Cargill would have been corn starch and things such as that.
 - -Dayton Door Sales--doors and windows, a lot of overhead doors.
 - -Duriron--metal dust and wood. Made wheels and things for trucks.
- 67-Ed's Truck & Trailer--basic trash. They worked on trucks and trailers.
 - -Fenton Foundry--trash and some metal dust.
 - -Gem City Tool--does not know what was in load.
 - -IF Webber--construction company.
 - -JE Duncan--construction company.
 - -Pizza Hut--construction when they were building new places.
 - -Ply Bricko--cannot recall what material was used.
 - -Viacom--cable and some wires for televisions.
- 68-Yale Industries--basic trash, aluminum stuff. Makes doors and windows.

Date Indexed: 11-29-93

BOYD DARRELL PEARSON DEPOSITION-INDEX (IWD Driver)

PAGE

- 3-Name, Address
- 3-6-Employment History
- 63-Hauled to the PRL in late 70's, early 80's. Has no idea what he was hauling. Would not have been diverted to PRL, it would have been a run there.
- 64-Can remember customer names, but can't remember where their waste went.
- 69-Has no "specific" information concerning customers or waste stream on PRL.

Date Indexed: 11-29-93

<u>JOHN HOGUE</u>-INDEX (IWD Driver)

- 3-Name, Address
- 3-7-Employment History
- 8-Ninety-five percent of waste went to incinerators. If diverted, it went to the PRL.
- 15-Dayton Air Fair--trash was mostly Coke cups and hamburger wrappers. May have gone to PRL.
 - -Alcon Builder--some waste probably went into PRL.
- 16-American Freight--some went to incinerator, some may have gone to PRL.
 - -American Roofing--may have gone to PRL.
 - -Aristocrat Products -- may have gone to PRL.
 - -Danis--may have gone to PRL or incinerator.
 - -Behm--may have gone to PRL.
 - -Cargill--may have hauled to PRL. Corn waste, cornstarch.
- 17-Colony Forest Park--may have gone to PRL.
 - -Concourse Construction -- may have gone to PRL.
 - -D & D Fence--may have gone to PRL.
- 18-Dahm Brothers--a roofing company. Waste generated were roofing materials, tar, shingles. Went to PRL.
 - -Duriron is a couple of compactors. Paper and debris out of factory. Went to PRL.
- 19-Fryman & Kuck Construction--may have gone to PRL. Construction debris.
 - -Gem City Engineering, Gem City Machine--same thing. May have gone to PRL. Basic trash from cafeteria or lunchroom.
- 20-Gold Circle was mostly cardboard. Department store. May have gone to PRL.
 - -Harrison Township--95% to incinerator, the rest to PRL when diverted.
 - -IML--used to be a freight line. Cardboard, skids.

21-Israel Brothers--scrap lumber.

- -J.E. Duncan--Construction company. Construction debris.
- -K-Mart had everything. Waste went to landfill.
- -Master Consolidated -- paper trash.
- 22-Mazer--paper trash. Printing company.
 - -McCulley Industries -- waste from factory.
- -Miles Lab--cornstarch waste.
- 23-Pepsi Cola--broken glass.
 - -Ply Bricko--fire brick.
- 24-Ryan Homes--construction debris.
 - -Stanley Terminal, a truck terminal. Tires and everything you could think of.
- -Stouffer's Inn--restaurant garbage.
 - -Tru-Foto--old photos and film.
- -Turner Construction -- construction debris.
 - -Van Con Construction -- construction debris.
 - -Viacom--cable television.
- 32-Hughes-Bechtol--its waste was hauled to PRL. Skids

Date Indexed: 11-30-93

GARY WOOLERY-INDEX (IWD Driver)

PAGE

- 3-Name, Address
- 3-6-Employment History
- 9-Remembers taking some loads to PRL, but doesn't know what they were. Does not recall any customer names.

Date Indexed: 11-30-93

DAN E. CONNAUGHTON-INDEX (IWD Driver)

- 3-Name, Address
- 3-7-Employment History
- 14-Capitol Cleaners--regular trash. Would have gone to PRL if diverted.-DAP--may have gone to PRL. Sealants like silicone.
- 19-NCR--If diverted north, waste would have gone to PRL.
- 20-If incinerators were closed or broken, waste was diverted to PRL.
- 22-Wright-Patterson--probably went to PRL. Regular construction trash.
- 23-BF Goodrich--would have gone to PRL if diverted.
- 24-25-Dayton Industrial Drum--may have been diverted to PRL. Basically dealt with fifty-five gallon drums.
- 26-Megacity Warehouse--may have gone to PRL. Paper trash.
- 27-Ohio Bell--most likely went to the PRL. Basically trash, telephone poles, some wire.
 -Philips Industries--waste probably went to PRL. Broken light bulbs, fluorescent tubes.
- 28-Premiere Rubber--probably went to the PRL. Lamp black type powder. They made rubber products.
- 29-Cargill--would have gone to north incinerator or PRL. Trash and starch.
- 31-Ryan Homes--waste went to PRL. Construction trash, wood and roofing. Hauled into PRL maybe one or two times at most. -Hughes-Bechtol--probably went into PRL. Construction trash.
- 32-Earl Scheib--maybe went to PRL. Basically paper waste.

- 33-34-Mazer Corporation--may have gone to PRL. Printing company. Paper and ink waste.
- 34-Pantorium Cleaners--may have been diverted to PRL from north incinerator.
- 35-University of Dayton--may have been diverted to PRL from south incinerator.
- 36-Bendix--may have been diverted to PRL. Just trash, nothing unusual.
- 37-Rinks Company--could have been diverted to PRL.
- 37-38-Blue Bird Pie--definitely went to PRL a couple of times. Trash and cans pie filling came in.
- 38-Gayston--probably went to PRL. Cardboard waste.
- 39-Vindale Corporation--waste would have gone to PRL. Wood, wiring and regular trash.
- 40-Opti-Gauge--may have gone to PRL. Computer boards trash.
- 41-Trotwood Corporation--may have gone to PRL. Trash, scrap metal.
 -UPS--may have gone to PRL. Basic trash, boxes.
- 43-44-Charles Shook Co.--waste may have gone to PRL. Construction company. Demolition debris.
- 45-Price Brothers--would have gone to PRL. Yard trash and regular trash.
 - -Fryman & Kuck Construction -- would have gone to PRL or north incinerator. Construction debris.

Date Indexed: 12-1-93

THOMAS E. SHOUP-INDEX (IWD Driver)

- 3-Name, Address
- 3-5-Employment History
- 7-Automotive Warehouse--cardboard, little pieces of metal pipe and some front end parts off of cars like tie rods.
- 8-General Telephone--paper trash, cardboard boxes.
- 9-City of Dayton--dumped in PRL at least once a week. -City of Vandalia--waste went to PRL for a while.
- 10-Duriron--a factory, foundry. Waste went to PRL probably twice a week.
- 10-11-Hewitt Soap--cardboard containers, wax paper, soap wrappings. Waste went to PRL.
- 11-Englewood Lumber--sawdust-type materials. Went to PRL.
- 12-Gem City Engineering--paper and regular trash.
- 13-Huber Heights--wood, cardboard, paper.
 -Mazer Corp--general trash, paper, cardboard. Generated something like a carbon dust or powder.
- 14-Frank Messer--construction company. Demolition-type material.
- 14-15-Mullins Rubber--cardboard, paper, trash, rubber floor mats.
- 15-North Dayton--construction. Would change their display racks. Hauled racks to PRL. Racks made of wood.
- 16-17-The Old Colony--made envelopes. Basic paper waste.
- 17-Pepsi-Cola--trash from inside a factory where they would sweep up the floors and throw everything into the trash compactor. There were separate containers for glass. It [glass] did not go to a landfill.

- 19-Premier Rubber--basically clean-up around the factory. Cardboard, paper, steel bands, no liquid.
 - -Price Brothers--clean-up around factory, paper, cardboard.
 - -Ryan Homes--cardboard boxes, sawdust, pieces of wood.
- 20-Tru-Foto--film not processed properly; damaged film. -Viacom--cable, broken boxes.
- 21-GH&R Foundry--dirt and general floor sweepings.
 -Wright-Patterson--building materials, demolition. May have gone to PRL.
- 23-Brainerd Industries--if diverted, would have gone to PRL. Paper, trash, cardboard.
- 26-DAP--makes caulking compounds, window sills. Powder, white dust. Believes waste went to PRL.
- 30-Harrison Radiator, Delco, GM/Inland--regular trash, cardboard, paper, gloves employees would throw away, sometimes skids.
- 31-Fox's Cleaners--plastic, the kind they would bag clothes in. Would have gone to PRL if diverted.
- 32-33-Globe Industries--general trash. If diverted, would have gone to PRL.
- 33-Holman Plating--dock trash, cardboard and paper.
- 34-Thompson's--plastic they wrap boxes in, cardboard, skids, carbon copies of paper. If diverted, would have gone to PRL.
- 39-California Market--general grocery store trash, bad fruit, vegetables, cardboard, bags. Waste would have gone to PRL if diverted.
- 40-Cargill would have gone to PRL. Cornstarch, regular corn, burnt corn.
- 41-Bendix Corp. -- waste went to incinerator, if closed, diverted to PRL.

Date Indexed: 12-1-93

<u>JAMES L. HARRIS, JR. DEPOSITION-INDEX</u> (IWD Driver)

PAGE

3-Name, Address

3-6-Employment History

Witness did not drive to the PRL. He drove to Cardington Road only.

Date Indexed: 12-8-93

W. THOMAS JOHNSON DEPOSITION-INDEX (IWD Driver)

PAGE

3-Name, Address

3-8-Employment History

Witness recalls hauling waste to the PRL, but does not remember any of the customer or generator names.

Date Indexed: 12-8-93

ARNOLD RAY POLLEY DEPOSITION-INDEX (IWD Driver)

PAGE

- 3-Name, Address
- 3-4-Employment History
- 16-City of Dayton hauled their own trash to the PRL.
- 17-18-Hauled Earl Scheib to the PRL. Paint cans, masking paper and filters.
- 19-21-Hauled Peffley Ford to the PRL. Automobile body parts-fenders, hoods, also oil filters.
- 49-Witness did not personally haul Globe's waste to PRL, but states that John Hogue did. Globe had sludge and cutting oil, also trash and shop towels that they used to sop up spills.
- 57-Price Brothers would have gone to the PRL. Broken concrete, paper bags.
- 63-Hauled waste from Brainerd Industries to the PRL. Mostly paper and flammable type products, solvents.
- 66-May have hauled waste of Holman Plating to the PRL. Plating chemicals, powders.

Date Indexed: 12-8-93